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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

LORENA GODINEZ,

Plaintiff,

vs.

**BMW OF NORTH AMERICA, LLC,
a Delaware Limited Liability
Company, and DOES 1 through 10,
inclusive,**

Defendants.

Case No.: 2:17-cv-5072-FLA (RAOx)

JOINT EXHIBIT LIST

Plaintiff LORENA GODINEZ and Defendant BMW OF NORTH AMERICA, LLC, by and through counsel, hereby submit the following exhibit list for the trial in the above-entitled action. The parties reserve the right to introduce exhibits designated and/or listed and/or offered by any party to this action, and hereby reserve the right to object to the admissibility of any exhibits designated, listed, and/or offered by any other party to this action. The parties further reserve the right to introduce exhibits for the purpose of impeachment, rebuttal, or rehabilitation and reserves the right to introduce additional exhibits upon appropriate notice to all parties. The Parties further hereby reserve the right to introduce additional exhibits as necessary, including, but not limited to any and all exhibits marked and attached to the depositions of any fact or expert witness taken in this action. The Parties further reserve the right to augment this Exhibit List following the conferencing with one another's counsel that is required pursuant to local rules.

PLAINTIFF'S EXHIBITS

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
1.	Retail Installment Sale Contract dated 12/31/09	X	X			
2.	McKenna BMW Repair Order No. 162832 dated 12/18/09 (GODINEZ000220-223)	X				
3.	McKenna BMW Repair Order No. 162949 dated 12/21/09 (GODINEZ000070-76)	X				

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
4.	McKenna BMW Repair Order No. 178380 dated 10/11/10 (GODINEZ000224-33) (Lorena Godinez vs. BMWNA 30)	X	X			
5.	McKenna BMW Repair Order No. 184358 dated 1/24/11 (GODINEZ000234-44) (Lorena Godinez vs. BMWNA 28-29)	X				
6.	McKenna BMW Repair Order No. 195979 dated 9/9/11 (GODINEZ000245-56) (Lorena Godinez vs. BMWNA 26-27)	X				
7.	McKenna BMW Repair Order No. 202850 dated 1/16/12 (GODINEZ000126-30) (GODINEZ000257-70) (Lorena Godinez vs. BMWNA 24-25)	X				

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
8.	McKenna BMW Repair Order No. 212135 dated 7/9/12 (GODINEZ000131-36) (GODINEZ000272-83) (Lorena Godinez vs. BMWNA 22-23)	X				
9.	McKenna BMW Repair Order No. 218120 dated 10/31/12 (GODINEZ000137-52) (GODINEZ000284-308) (Lorena Godinez vs. BMWNA 18-21)	X				
10.	McKenna BMW Repair Order No. 221071 dated 12/31/12 (GODINEZ000153-56) (GODINEZ000309-319) (Lorena Godinez vs. BMWNA 17)	X				

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
11.	McKenna BMW Repair Order No. 223125 dated 2/11/13 (GODINEZ000157-162) (GODINEZ000320-32) (Lorena Godinez vs. BMWNA 15-16)	X				
12.	McKenna BMW Repair Order No. 224484 dated 3/11/13 (GODINEZ000163-66) (GODINEZ000333-44) (Lorena Godinez vs. BMWNA 14)	X				
13.	McKenna BMW Repair Order No. 232745 dated 8/8/13 (GODINEZ000167-77) (GODINEZ000345-62) (Lorena Godinez vs. BMWNA 11-13)	X				

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
14.	McKenna BMW Repair Order No. 233213 dated 8/17/13 (GODINEZ000178-84) (GODINEZ000363-69) (GODINEZ000370-82) (Lorena Godinez vs. BMWNA 9-10)	X				
15.	McKenna BMW Repair Order No. 239846 dated 12/27/13 (GODINEZ000185-94) (GODINEZ000383-401) (Lorena Godinez vs. BMWNA 6-8)	X				
16.	McKenna BMW Repair Order No. 240249 dated 1/4/14 (GODINEZ000195-96) (GODINEZ000402-12)	X				

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
17.	New Century BMW Repair Order No. 915264 dated 11/26/14 (GODINEZ000197-200) (GODINEZ000417-28)	X				
18.	New Century BMW Repair Order No. 944017 dated 10/24/15 (GODINEZ000429-33) (GODINEZ000435) (GODINEZ000437-57)	X				
19.	New Century BMW Repair Order No. 973019 dated 9/26/16 (GODINEZ000210-12) (GODINEZ000459-62) (GODINEZ000471-501) (Lorena Godinez vs. BMWNA 32-37)	X				

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
20.	New Century BMW Repair Order No. 979975 dated 12/9/16 (GODINEZ000503-06) (GODINEZ000509-58)	X				
21.	New Century BMW Repair Order No. 1002966 dated 8/30/17 (Lorena Godinez vs. BMWNA 39-40)	X				
22.	New Century BMW Repair Order No. 1033915 dated 8/28/18 (Lorena Godinez vs. BMWNA 50-52)	X				
23.	New Century BMW Repair Order No. 1039168 dated 10/29/18 (Lorena Godinez vs. BMWNA 63-65)	X				
24.	New Century BMW Repair Order No. 1041238 dated 11/24/18 (Lorena Godinez vs. BMWNA 66-68)	X				

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
25.	New Century BMW Repair Order No. 1041240 dated 11/24/18 (Lorena Godinez vs. BMWNA 69-71)	X				
26.	New Century BMW Repair Order No. 1044752 dated 1/7/19 (Lorena Godinez vs. BMWNA 72-73)	X				
27.	American Tire Depot Invoice dated 10/8/16 (Lorena Godinez vs. BMWNA 41)					
28.	American Tire Depot Invoice dated 12/22/17 (Lorena Godinez vs. BMWNA 42-43)					
29.	American Tire Depot Invoice dated 7/27/18 (Lorena Godinez vs. BMWNA 53-54)					
30.	Purchase Documents (GODINEZ000065-69)					

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
31.	DMV Documents (Lorena Godinez vs. BMWNA 3-4, 58, 92, additional pages)	X	X			
32.	Insurance Documents (Lorena Godinez vs. BMWNA 5, 59-62, 77-80, 90-91, 93-111)					
33.	Letter from BMW Financial Services to Plaintiff dated March 20, 2018 (Exhibit 3 Plaintiff's Depo)	X	X			
34.	Email from BMW to Plaintiff RE: Plaintiff's Repurchase Request dated 11/10/16 (Lorena Godinez v. BMWNA 56-57)	X	X			
35.	Internal BMW Email RE: Plaintiff's Repurchase Request dated 11/10/16 (GODINEZ000219)	X	X			
36.	Service History Recap through 9/26/16 (GODINEZ000119-20)					

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
37.	Warranty Vehicle Inquiry dated 11/10/16 (GODINEZ000215- 18)	X				
38.	Warranty Claim Details dated 11/11/16 (GODINEZ000121- 125)	X				
39.	Warranty Vehicle Inquiry dated 4/26/17 (GODINEZ000087- 118)	X				
40.	Warranty Vehicle Inquiry dated 8/6/18 (Holguin Expert File)	X				
41.	Service Request Detail S01028802381 dated 10/15/10 (GODINEZ000077- 78)	X	X			
42.	Service Request Detail S01219805190 dated 7/16/12 (GODINEZ000079- 80)	X	X			

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
43.	Service Request Detail 201631205281 dated 11/23/16 (GODINEZ000081-86)	X	X			
44.	SI B 63 06 10 – LEDs in Rear Lamp Inoperative (GODINEZ000593)	X	X			
45.	SI B 61 02 13 – Recall Campaign 13v-044: Repair Battery Positive Cable; Attachment for Repair Battery Positive Cable (GODINEZ000564-76, 589-92)	X				
46.	SI B 61 02 13 – Customer Letter RE: Recall Campaign 13v-044: Repair Battery Positive Cable (GODINEZ000561-63)	X				
47.	SI B 61 02 13 – Q&A RE: Recall Campaign 13v-044: Repair Battery Positive Cable (GODINEZ000577-79)	X				

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
48.	SI B 12 18 14 – Engine Misfire Due to Failed Ignition Coil (GODINEZ000586-88)	X				
49.	SI B 01 20 16 – Footwell Module: Limited Warranty Extension to 8 Years/125,000 Miles; Attachment for Footwell Module: Limited Warranty Extension to 8 Years/125,000 Miles (GODINEZ000559-60, 580-85)	X				
50.	SI B 11 16 17 – Recall 17V-683: Positive Crankcase Ventilation (PCV) Valve Heater; Repair Procedures for Positive Crankcase Ventilation (PCV) Valve Heater (Holguin Expert File)	X				

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Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
51.	SI B 64 07 17 – Recall 17V-676: Blower Motor Wiring; Repair Procedures for Short Repair Cable; Repair Procedures for Wire Harness Connector; Repair Procedures for Harness Checking Procedure (Holguin Expert File)	X				
52.	Service and Warranty Information Booklet – 2010 1 Series, 3 Series, 5 Series, 6 Series (GODINEZ000001-61)	X	X			
53.	BBB California Lemon Law Summary (Redacted) (Lorena Godinez vs. BMW NA 84-89)					
54.	Owner's Manual for Vehicle – 328i, 328i xDrive, 335i, 335i xDrive, M3	X	X			

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Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
55.	Photographs of Vehicle (Lorena Godinez vs. BMWNA 46-49) (Exhibit 4 Plaintiff's Depo) (Lorena Godinez vs. BMWNA 81)					
56.	German Imports Auto Inc. Invoice dated 6/25/18 (Lorena Godinez vs. BMWNA 55)					
57.	New Century BMW Repair Order No. 1054543 dated 5/9/19 (Lorena Godinez vs. BMWNA 74-76)					
58.	BMW Advertisement: Nothing Less Than Perfection (Lorena Godinez vs. BMWNA 82-83)					
59.	New Century BMW Repair Order No. 1073397 dated 12/23/19	X				
60.	New Century BMW Repair Order No. 1074082 dated 1/2/20	X				

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Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
61.	New Century BMW Repair Order No. 1084644 dated 6/23/20	X				
62.	Montebello Smog Check Invoice No. 36681 dated 11/7/20					
63.	New Century BMW Repair Order No. 1094193 dated 11/19/20	X				
64.	New Century BMW Repair Order No. 1096189 dated 12/22/20	X				
65.	New Century BMW Repair Order No. 1098631 dated 2/3/21	X				
66.	American Tire Depot Invoice dated 5/3/21					
67.	New Century BMW Repair Order No. 1104508 dated 5/13/21	X				
68.	2010 BMW 3 Series Coupe Sales Brochure – 328i, 328i xDrive, 335i, 335i xDrive					
69.	New Century BMW Repair Order No. 1081441 dated 4/23/20					

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
70. - 999	<i>Reserved</i>					

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DEFENDANT'S EXHIBITS

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Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection Response	Date Id.	Date Adm.
1000.	Vehicle Repair Timeline – Demonstrative					
1001.	Withdrawn					
1002.	Vehicle Warranty History	X	X			
1003.	BMW BBB Arbitration Certification Program					
1004.	Certificate of Certified Status					
1005.	Withdrawn					
1006.	Carfax re subject vehicle					
1007.	Luis Holguin expert disclosure and expert report					
1008.	Relevant Portions of Service Manual for BMW 3 Series 2006-2010				Withdrawn	
1009.	Diagram Re Oil Filter Housing Gasket and Gasket					
1010.	Diagram Re Drive Belt Pulley, Idler Pulley, and Power Steering Pump					

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1011.	Diagram Re Coolant System					
1012.	Diagram Re Window Regulator					
1013.	Diagram Re Valve Cover and Exemplar Valve Cover Gasket					
1014.	Diagram Re O2 Sensor					
1015.	Foot Well Module Description					
1016.	Exemplar Tail Lamp LED Circuit Board					
1017.	Front Brake Caliper Diagram					
1018.	Gas Cap Photograph and Exemplar Gas Cap					
1019.	Procedure 61 02 13 Re Battery Cable					
1020.	Ignition Coil Diagram					
1021.	Exemplar Valve Cover					
1022.	Customer Contact Log					

1023.	Email dated 12/19/16 to Jose Conde re additional vehicle repair with attached documents	X	X			
1024.	Email re Jose Conde's Response to 12/19/16 email	X	X			
1025.	Fan speed control/IHKA module.					
1026 - 1050.	Reserved					

Respectfully Submitted,

DATED: October 7, 2021

KNIGHT LAW GROUP, LLP

By: /s/ Scot D. Wilson
 Scot D. Wilson
 Greg R. Mohrman
 Attorneys for Plaintiff,
 LORENA GODINEZ

DATED: October 7, 2021

LEHRMAN LAW GROUP

By: /s/ Daniel R. Villegas
 Daniel R. Villegas
 Attorneys for Defendant,
 BMW OF NORTH AMERICA, LLC